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*Attorneys for Plaintiff*  
THAT ONE VIDEO ENTERTAINMENT, LLC, a  
California limited liability company

**UNITED STATES DISTRICT COURT**  
**FOR THE CENTRAL DISTRICT OF CALIFORNIA**

THAT ONE VIDEO  
ENTERTAINMENT, LLC, a  
California limited liability company,

Plaintiff,  
vs.

KOIL CONTENT CREATION PTY  
LTD., an Australian proprietary  
limited company doing business as  
NOPIXEL; MITCHELL CLOUT, an  
individual; and DOES 1-25, inclusive,

Defendants.

CASE NO: 2:23-cv-02687 CAS (JCx)

[Assigned to the Hon. Stephen V. Wilson;  
Ctrm 10A]

**JOINT STATUS REPORT**

*[Declaration of Benjamin Lau filed  
concurrently herewith]*

**Hearing**

Judge: Hon. Jacqueline Chooljian

Date: September 24, 2024

Time: 9:30 a.m.

Place: Ctrm 750, 255 East Temple Street,  
Los Angeles, CA 90012

Action Filed: April 10, 2023

Trial Date: September 17, 2024

1 Counsel for Plaintiff THAT ONE VIDEO ENTERTAINMENT, LLC, a  
2 California limited liability company ("Plaintiff") and Defendants KOIL CONTENT  
3 CREATION PTY LTD., an Australian proprietary limited company doing business  
4 as NOPIXEL ("NoPixel") and MITCHELL CLOUT, an individual ("Clout")  
5 (collectively, "Defendants"), have met and conferred and hereby submit this status  
6 report in response to the Order issued on August 30, 2024. (Dkt. 59).

7 The Order indicates that the parties do not address whether federal or state  
8 privilege law applies. The Order further states that "federal jurisdiction in this case is  
9 predicated solely on the Declaratory Judgment Act, 28 U.S.C. § 2201, with  
10 supplemental jurisdiction afforded to the other claims under 28 U.S.C. § 1367." (Dkt.  
11 59). The parties hereby stipulate and agree with this Court's assessment as to how  
12 federal and supplemental jurisdiction applies.

13 Furthermore, the Order indicated that the parties should discuss whether the  
14 issue as to communications with immigration counsel can be resolved via a brief  
15 declaration. The parties have agreed that a declaration from Plaintiff's immigration  
16 counsel, Benjamin Lau, Esq would obviate the need for the production of documents.  
17 Plaintiff will obtain a declaration from Mr. Lau no later than September 13, 2024,  
18 and the parties will update the court by September 16, 2024 as to whether the relevant  
19 Motion must still be heard.

20  
21 DATED: September 10, 2024

ALTVIEW LAW GROUP, LLP

22  
23 By:

  
JOHN M. BEGAKIS  
SHEENA B. TEHRANI

24  
25 *Attorneys for Plaintiff* THAT ONE VIDEO  
26 ENTERTAINMENT, LLC, a California  
27 limited liability company  
28

DATED: September 10, 2024

**MORRISON COOPER LLP**

By: /s/ Larry Zerner

**LARRY ZERNER**  
*Attorneys for Defendants* KOIL  
CONTENT CREATION PTY LTD., an  
Australian proprietary limited company  
doing business as NOPIXEL, and  
MITCHELL CLOUT, an individual

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing electronically filed document has been served via a “Notice of Electronic Filing” automatically generated by the CM/ECF System and sent by e-mail to all attorneys in the case who are registered as CM/ECF users and have consented to electronic service pursuant to L.R. 5-3.3.

Dated: September 10, 2024

By: /s/ John Begakis  
John M. Begakis